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May 27, 2025

VIA ECF

The Honorable Dennis Montali
United States Bankruptcy Court
Northern District of California
450 Golden Gate Ave., 16th Floor
San Francisco, CA 94102

Re: *In re The Roman Catholic Archbishop of San Francisco*, Case No. 23-30564
Response of Sacred Heart Cathedral Preparatory to the Committee's Letter Containing the
Committee's Motion to Compel

Dear Judge Montali:

McDermott Will & Emery LLP is counsel to Sacred Heart Cathedral Preparatory ("Sacred Heart Cathedral"), which is a non-debtor interested party in the above-captioned chapter 11 proceedings and a defendant in *The Official Committee of Unsecured Creditors v. The Roman Catholic Archbishop of San Francisco, et al.*, Adv. Pro. No. 25-03021. Sacred Heart Cathedral has received the Official Committee of Unsecured Creditors' (the "Committee") *Letter to the Hon. Judge Dennis Montali re Discovery Dispute* [Docket No. 1201] (the "Letter Containing the Committee's Motion to Compel"), and the Roman Catholic Archbishop of San Francisco's (the "Debtor") *Response to Committee's Letter re Discovery Dispute* [Docket No. 1203] (the "Debtor's Response").

Sacred Heart Cathedral opposes the Letter Containing the Committee's Motion to Compel and joins in all arguments made in the Debtor's Response to the extent that any discovery the Committee seeks by the Letter Containing the Committee's Motion to Compel contains any information, documents, or communications concerning or belonging to Sacred Heart Cathedral. Sacred Heart Cathedral respectfully submits this letter out of an abundance of caution to protect its rights regarding the production of any of Sacred Heart Cathedral's information, documents, and communications.

Counsel to Sacred Heart Cathedral is available to discuss this matter further at the Court's convenience.

Respectfully submitted,

/s/ Lisa A. Linsky

Lisa A. Linsky

CC: All Counsel of Record (via ECF)

McDermott
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